

1 some action on your earlier request for
2 whatever you are requesting, basically
3 approval of a license --

4 MR. CATALANO: It would be
5 approval of the individual licenses.

6 JUDGE SIPPEL: Yes, I understand.

7 MR. CATALANO: -- and within the
8 context of Second Thursday, we would meet the
9 standards. No wrongdoer is being benefitted.
10 The value is -- There is no excess value, and
11 there was a good faith finding by the court.

12 JUDGE SIPPEL: Now hear me. Maybe
13 I am not making myself clear. There are two
14 questions. There is the question of the
15 overall application of Second Thursday to this
16 particular situation. The situation requires
17 bankruptcy approval of a plan.

18 So the plan comes into it.
19 Valuation is in the plan. All that has to be
20 looked at. You want your license situation
21 segregated from that, because -- and you made
22 a good point -- basically, it has already been

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1 cleared by the Bankruptcy Court.

2 Whatever the relief is that you
3 are seeking from the Commission -- I believe
4 you have something pending up here, don't you,
5 either as an individual or as a group? Have
6 you gone to the Commission at all?

7 MR. CATALANO: What is pending is
8 the reconsideration that all the applicants
9 are in requesting the Commission to transfer
10 the license. That is pending, that issue, but
11 that is a separate track to get the license
12 transferred, Your Honor.

13 JUDGE SIPPEL: What I am saying is
14 that I don't think that you are absolutely
15 left without a remedy, but how successful the
16 remedy would be -- and the remedy would be to
17 seek some kind of -- I wanted to say
18 emergency, but some kind of immediate relief
19 from the Commission on the basis of what you
20 have laid out, and try to expedite the request
21 for reconsideration that way or something like
22 that. But there is nothing. I can't start

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1 piecing it out that way, because I know it is
2 going to just be sent right back to me. I am
3 sure it will be.

4 So it is all or nothing here, as
5 far as Second Thursday is concerned, unless
6 the designation were to change, unless I am
7 directed to do otherwise. And I am not trying
8 to hold it back. I am trying to get in the
9 position where it is put together so that it
10 is not going to come back to me.

11 MR. ZDEBSKI: Your Honor, may I
12 add in?

13 JUDGE SIPPEL: Yes, please. Your
14 name again? I know you are from Duquesne.

15 MR. ZDEBSKI: Charlie Zdebski for
16 Duquesne Light. The Enforcement Bureau has
17 been pushing to move ahead in this proceeding
18 and has questioned what has gone on in the
19 Bankruptcy proceeding, including the valuation
20 and the process of approval.

21 One way for the Enforcement Bureau
22 to get that information and to be involved in

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1 the valuation question is to participate in a
2 bankruptcy proceeding. I think, as Mr.
3 Catalano said before, they have the right to
4 do it. If I were the Enforcement Bureau, I
5 guess I would avoid doing it, too, so that I
6 could take a second bite at it when it comes
7 back here, but that is holding up the process.

8 We have people who are testifying,
9 people who are being deposed, and the
10 valuation issue is squarely before the
11 Bankruptcy Court and will be decided there.
12 The Enforcement Bureau is deciding it will
13 wait to come back here and then look at it in
14 the context of Second Thursday.

15 So we have proposed a creative
16 solution to get our applicants with a need for
17 licenses for critical infrastructure out of
18 this situation, and what the Enforcement
19 Bureau is proposing is going to hold up the
20 process even longer.

21 JUDGE SIPPEL: The Enforcement
22 Bureau is just doing its job. There is all

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1 kinds of reasons why the Bureau decision --
2 the prosecutory discretion of the Bureau would
3 be whether or not to try and -- First of all,
4 it has to move to appear in the bankruptcy
5 proceeding. I am not sure s a Judge that
6 bankruptcy judge would particularly like
7 getting that message, and that is a management
8 decision in the discretion of the Bureau or
9 the Commission, not me.

10 So talk to Ms. Kane, but I don't
11 think -- Well, I have said as much as I can.
12 I can't do anything for you here.

13 MS. KANE: Your Honor, I think we
14 have been extremely active in trying to move
15 this case forward in this hearing, in this
16 forum, which is where we are a party, and I
17 think we find it offensive that we are now
18 being accused of somehow trying to hold up
19 this hearing and this process, because we are
20 not participating for some prosecutorial
21 reason or management decision as a Commission,
22 because it is not the Enforcement Bureau that

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1 would make an appearance in front of the
2 Bankruptcy Court. It would be the Commission,
3 and that is a totally different entity than us
4 -- and that we are somehow trying to hold up
5 the process here by not participating there.

6 The reality is that there are
7 overlapping issues between the two, because of
8 the fact that there is a bankruptcy
9 proceeding, and Maritime intends to seek
10 Second Thursday treatment.

11 There is an overlapping series of
12 issues, which is why, if you recall, Your
13 Honor, you allowed certain discovery
14 concerning the valuation and concerning at
15 least some identification of who the creditors
16 were as part of this hearing process during
17 our last prehearing conference in October.

18 Now with regard to that, we did
19 get some of the valuation information, but we
20 did not get what we thought we were going to
21 get, which was an identification of not only
22 who the creditors were, but what their

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1 relationships were to Maritime. How did they
2 become creditors? What is their -- Why was it
3 that they lent money to Mr. DePriest? What is
4 their relationship, their personal
5 relationship or professional relationship with
6 the at least named wrongdoers, in order to
7 determine whether or not some of these
8 innocent creditors are, in fact, not innocent
9 for the very purposes of Second Thursday?

10 JUDGE SIPPEL: What kind of
11 discovery are you going to need for that? Are
12 you going to depose all these creditors?

13 MS. KANE: We would like at some
14 point at least to be deposing the Maritime
15 principals, but obviously, we don't want to do
16 that piecemeal. So since Your Honor has
17 allowed discovery to go forward on Issue G and
18 at least some limited amount of discovery that
19 was related to Second Thursday as part of our
20 last prehearing conference, we wanted to have
21 a single deposition and try to keep all these
22 depositions together. But since we have no

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1 movement yet on Issue G discovery, we haven't
2 been able to pursue discovery of Maritime
3 principals on some of these other issues as
4 well.

5 JUDGE SIPPEL: Well, you are
6 trying to shoehorn Issue G discovery into the
7 bigger picture, seems to me.

8 MS. KANE: Well, I am not trying
9 to shoehorn it, Your Honor. It is a separate
10 issue, but the reality is that I have no
11 doubt, if we tried to take multiple
12 depositions of Mr. DePriest, either on Issue
13 G and/or on issues that might relate to the
14 Second Thursday, that they would put up some
15 sort of objection to that.

16 So we were trying to get all of
17 our discovery ducks in a row before we deposed
18 some of these witnesses.

19 JUDGE SIPPEL: To play that down,
20 we could offer them a deal, either two for
21 nothing. You can answer questions about the
22 whole schmeer, the whole thing, or you are

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1 going to get questions on just Issue G. It is
2 up to you. It is up to the Maritime parties
3 whether or not they want to run the risk of
4 being hit with double depositions. I don't
5 know.

6 If it is a question of money from
7 the standpoint of the Bureau's efficiency,
8 then I am afraid you are going to have to
9 wait. I am not sure what the answer to that
10 is, but I am not going to give you relief on
11 that basis alone. If you want to take a
12 deposition from somebody at Maritime on the
13 issue of Issue G, I have no problem with
14 granting that, permission to do that.

15 MS. KANE: No, I understand that,
16 Your Honor, but we have no discovery yet on
17 Issue G. So it wasn't prudent to go forward
18 with a deposition on those issues until that
19 discovery is in front.

20 JUDGE SIPPEL: I understand. I
21 didn't mean to say that that is what you
22 should be doing. I am simply saying that is

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1 the -- Now what discovery is needed on Issue
2 G that you haven't already undertaken? You
3 have already undertaken it, but you haven't
4 gotten the answers?

5 MS. KANE: We have -- As you
6 recall in the last prehearing conference, we
7 have worked with Mr. Havens and we worked with
8 their counsel to provide Your Honor with a
9 joint motion for discovery on Issue G. It
10 included a series of document requests and
11 interrogatories.

12 We filed that, I believe, sometime
13 in early December. You had asked to approve
14 of that discovery before maritime would
15 respond to it. Now in December Maritime
16 objected to the discovery not in its scope,
17 but only to the fact that apparently Mr.
18 Havens was seeking similar discovery in other
19 forums. But in that pleading, Maritime said
20 they were willing to provide the information.

21 They have not provided it in
22 absence of an order from Your Honor.

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1 JUDGE SIPPEL: All right.
2 Consider that done. You have an order.
3 Maritime has an order to proceed with giving
4 the Bureau everything they have asked for that
5 is not objected to. Just do it, but I will
6 get an order out on that today or tomorrow.
7 That is a failure on my part. I understand.
8 I have been preoccupied, though.

9 MS. KANE: And we understand that,
10 Your Honor. The other issue --

11 JUDGE SIPPEL: I even had a
12 friend's funeral I had to go to yesterday.

13 MS. KANE: Oh, I am sorry about
14 that.

15 JUDGE SIPPEL: Well, this is how
16 things happen, you know.

17 MS. KANE: Well, that prompted our
18 motion to extend the deadline, which was last
19 Friday, for the discovery deadline for Issue
20 G, and I think now we are at a point, Your
21 Honor, where we need to set a new discovery
22 deadline for the Issue G discovery, both of

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1 Maritime and Pinnacle Wireless, which you have
2 added in as a party, and maybe any other
3 parties who may have information. We don't
4 know yet, because we haven't received
5 discovery from Maritime as to whether any of
6 the other parties in the hearing may have
7 relevant discovery relevant to Issue G.

8 JUDGE SIPPEL: Any other parties
9 in this proceeding?

10 MS. KANE: They may.

11 JUDGE SIPPEL: Have you asked
12 them?

13 MS. KANE: Well, no, we haven't,
14 Your Honor. We served discovery on parties
15 with regard to very basic information early in
16 this case, and they have refused to respond to
17 that. So we hadn't proceeded with other party
18 discovery until we got discovery from
19 Maritime.

20 JUDGE SIPPEL: Well, wait a
21 minute. I am not talking about that. I am
22 talking about -- Do you have reason to believe

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1 that any of these parties being represented
2 here, you know, the assignment parties -- I
3 don't know what you want to call them -- that
4 they have some knowledge about Issue G?

5 MS. KANE: I personally don't,
6 Your Honor, because we have nothing to
7 indicate that, but then again we did not know
8 that Pinnacle Wireless would have discovery.
9 They weren't even a party to this case until
10 they moved for intervention.

11 JUDGE SIPPEL: It is a whole new
12 ballgame, but they have explained exactly why.
13 They have got a good reason.

14 MS. KANE: Agreed, Your Honor.

15 JUDGE SIPPEL: I've got to be able
16 to safely get up and down the Jersey Turnpike,
17 you know.

18 MS. KANE: Agreed, Your Honor, but
19 we have basically been on hold waiting for
20 Maritime to respond to the discovery on Issue
21 G, and that --

22 JUDGE SIPPEL: Well, I want to

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1 move that along. I told you that.

2 MS. KANE: I understand that. We
3 assume that will inform our decisions going
4 forward in terms of discovery of other either
5 parties or nonparties.

6 MR. HAVENS: Some of the parties
7 are buying site based licenses.

8 JUDGE SIPPEL: Say that again.

9 MR. HAVENS: Your Honor, some of
10 the applicants' parties are purchasing site
11 based licenses. In regard to site based
12 licenses, therefore, they should have
13 information on what they are purchasing.

14 JUDGE SIPPEL: Oh, I see what you
15 are saying. Let me just ask the question in
16 general. Does anybody -- Do any of these
17 applicant assignment parties have any
18 information on Issue G? Do you know what
19 Issue G is? It is basically -- It was
20 construction of a particular location. I am
21 getting quizzical looks to denials, shaking
22 heads.

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1 I could get something added to my
2 order and say that they have an obligation to
3 come forward if they have any information on
4 that issue, but again I don't want to start
5 poking around without having a basis for doing
6 it on fact finding.

7 Pinnacle should be able to give a
8 lot of information to you. They laid it out.

9 MS. KANE: That is only on two of
10 the site based licenses, Your Honor. There
11 are other licenses that are at issue in the
12 construction.

13 JUDGE SIPPEL: IN the Issue G
14 issue?

15 MS. KANE: In the Issue G issue.
16 I believe there is something like eight or
17 nine site based licenses at issue, as to
18 whether or not they have been constructed
19 and/or discontinued.

20 MR. HAVENS: I believe all of them
21 are subject to Issue G. There is no
22 limitation stated on that in the hearing

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1 designation order, and there are site based
2 licenses throughout the country.

3 JUDGE SIPPEL: Mr. Havens is
4 talking. I am talking to the court reporter.

5 Well, there has got to be a better
6 way to get at this than what we are talking
7 about here, but there has got to be some
8 specification worked out. I would ask the
9 Bureau to undertake that as soon as they
10 reasonably can.

11 What I am talking about is narrow
12 down exactly who you have reason to believe
13 knows something about this issue, and
14 certainly the site -- any site based location
15 that is alleged to be a venue for a
16 construction violation, whatever you want to
17 call it, would be the most logical place, and
18 Pinnacle can start its discovery if they are
19 participating for that purpose, or Pinnacle
20 can give you -- Have you interviewed Pinnacle
21 at all?

22 MS. KANE: We haven't yet, Your

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1 Honor. We were waiting until you made them a
2 party last week. So we are --

3 JUDGE SIPPEL: They are a party.

4 MS. KANE: I understand. We are
5 in the process of preparing written discovery
6 for Pinnacle, and we expect them to be able to
7 produce that information.

8 JUDGE SIPPEL: It is perfectly
9 proper for them to -- You need to pick up the
10 phone and talk to the attorneys, talk to the
11 principals, you know, if the attorney agrees,
12 and get as much information that way as you
13 can, but certainly proceed with the discovery.
14 But they seem to be willing to -- They seem
15 to be very willing to cooperate with you.

16 MS. KANE: They have been, Your
17 Honor.

18 JUDGE SIPPEL: Go to it.

19 MR. PLACHE: Your Honor, just to
20 clarify. Matthew Plache speaking for
21 Pinnacle.

22 JUDGE SIPPEL: Thank you.

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1 MR. PLACHE: There is one license,
2 one site based license, that Pinnacle leases
3 from Maritime, and it is station WRV 374.

4 JUDGE SIPPEL: Station RV?

5 MR. PLACHE: I think it is WRV
6 374.

7 JUDGE SIPPEL: As in Victor?

8 MR. PLACHE: 374.

9 JUDGE SIPPEL: Where is that
10 located?

11 MR. KELLER: Has multiple sites.

12 MR. PLACHE: Multiple sites, yes.

13 MR. HAVENS: That is the Atlantic
14 Coast multiple station license.

15 JUDGE SIPPEL: Multiple sites on
16 the Atlantic coast?

17 MR. HAVENS: Yes, sir.

18 JUDGE SIPPEL: Okay, thank you,
19 Mr. Havens.

20 MR. PLACHE: Our understanding is
21 Maritime does have a lot of other site based
22 licenses, and Maritime has information on the

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1 construction of the licenses as well. But
2 Pinnacle does have information on what it has
3 done with this particular license.

4 JUDGE SIPPEL: But there is a lot
5 more. There is a lot more than just what
6 Pinnacle knows.

7 MR. PLACHE: I can't speak for
8 Maritime, but --

9 JUDGE SIPPEL: No, no, I am not
10 thinking about Maritime, but I mean there are
11 other sites out there that you really don't
12 have information on.

13 MR. PLACHE: Other stations that
14 Pinnacle does not have an interest in.

15 JUDGE SIPPEL: So you would have a
16 lesser amount of information on those,
17 obviously, if any.

18 MR. PLACHE: I would probably have
19 as much as -- maybe less than the Enforcement
20 people.

21 JUDGE SIPPEL: Would you be
22 willing to have one of your principals sit

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1 down with Bureau counsel and --

2 MR. PLACHE: Absolutely. We
3 would like to do that, and I will arrange it
4 with Ms. Kane.

5 JUDGE SIPPEL: Fine.

6 MR. PLACHE: We are willing and
7 happy to cooperate.

8 JUDGE SIPPEL: I am going to
9 assume that that is being undertaken, and then
10 is that satisfactory to you now as a starter,
11 obviously?

12 MS. KANE: Absolutely, Your Honor.
13 We were planning on starting that. Obviously,
14 we would like to also know what the general
15 timeline is for us to obtain all of this
16 discovery.

17 JUDGE SIPPEL: Well, that is what
18 I am going to --

19 MR. MR. KELLER: Your Honor,
20 excuse me. May I? Before we get on to the
21 general timeline, I just wanted to say a
22 couple of quick -- clarify a couple of quick

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1 things about this issue, which is responding
2 to the outstanding discovery request.

3 Ms. Kane is correct. We did state
4 in our filing that we were prepared to move
5 forward on Issue G and would respond to the
6 discovery request upon the order of Your
7 Honor. We stated in there that we were
8 prepared to respond to those requests within
9 10 days of the order. That is the time for
10 one form of discovery. I think the other one
11 has 14 days, but to show good faith, we are
12 going to give them the four days.

13 So I am assuming your order will
14 be out today or tomorrow. So it will be 10
15 days from today that we would be doing that.

16 She also said we did not object to
17 the scope of the discovery. That is accurate.
18 I just want to make one thing clear, so that
19 nobody is sort of caught off guard.

20 While we will be fully responding
21 to all the questions, it is going to be
22 subject to a caveat. We are going to suggest

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1 that a lot of these site based licenses are
2 subsumed within geographic licenses, and we
3 believe that, therefore, that sort of moots
4 the issue.

5 We can explain all that later, but
6 my point is we are not going to withhold
7 discovery on that basis, but we are going to
8 be stating up front as a caveat that we are
9 not, in providing the discovery, conceding
10 that issue.

11 Then finally, an issue that I
12 wanted to bring up, because again I don't want
13 this to come as a surprise after the hearing.
14 One of the things the Commission requested
15 with a document request were all documents
16 relating to this.

17 JUDGE SIPPEL: The Commission or
18 the Bureau?

19 MR. KELLER: The Bureau. I'm
20 sorry, the Bureau asked. That is on of the
21 things in the discovery request, a request for
22 production of documents.

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1 We have documents, at least 12
2 boxes of documents that are all the documents
3 relating to the facilities. These include
4 construction information, site drawings,
5 leases, all that sort of thing. But as I say,
6 that alone, just those call sign files alone,
7 took up 12 boxes which we managed to get here
8 from Indiana, but it would cost us at least
9 \$8,000 and probably more -- we got an estimate
10 -- to scan in one copy -- you know, just to
11 scan in, have it scanned in for some sort of,
12 I don't know. It would cost much more than
13 that to make multiple paper copies.

14 My interpretation of the discovery
15 rule is that we are required to make items
16 available for inspection and copying. So what
17 we are going to do is we will make those
18 documents available. We got them to
19 Washington.

20 They are here in Washington. We
21 will make them available for inspection, but
22 Maritime literally -- I mean absolutely

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1 literally -- does not have the money to make
2 copies and, even if it did, I am not sure that
3 we could expend \$10,000 for something like
4 that without court approval, Bankruptcy Court
5 approval.

6 So we are going to make them
7 available. We have managed to get them here
8 to Washington for that purpose, but we are not
9 equipped to make copies of them.

10 JUDGE SIPPEL: Are they in your
11 offices?

12 MR. KELLER: Right now they are in
13 the office of a copy center in downtown who is
14 holding them for us to wait to see what we are
15 deciding to do. We had them delivered to --
16 it is called --

17 JUDGE SIPPEL: That is okay. You
18 don't have to tell me exactly. Let me just
19 ask you this, both counsel. If those
20 documents were in your custody, in your firm's
21 custody, you have a conference room of some
22 kind?

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1 MR. KELLER: Well, not that we can
2 -- That is why we took them to the copy
3 center, because it is a huge amount of
4 documents, and we put them there, figuring
5 that way, if people want to make copies, they
6 are right there at the copy center.

7 JUDGE SIPPEL: Oh, I see.

8 MR. KELLER: They are in like a
9 little room or an office at the copy center.

10 JUDGE SIPPEL: Well, what kind of
11 a facility do they have that you can examine
12 documents?

13 MR. KELLER: They have the ability
14 to be examined there. There is a couple of
15 desks or something. I mean, I have been in
16 there.

17 JUDGE SIPPEL: They do?

18 MR. KELLER: Yes. I have been in
19 there a couple of times to go through them
20 myself.

21 JUDGE SIPPEL: Is it in
22 Washington, D.C.?

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